

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION

AYLO PREMIUM LTD, a limited liability
company organized under the laws of the
Republic of Cyprus,

Plaintiff,

vs.

JOHN DOES 1 - 20 D/B/A, PORNX.P.COM,
PORNX.P.NET, PORNX.P.CC, PORNX.P.ORG,
PORNX.P.CLOUD, PORNX.P.EU,
PORNX.P.CLICK, PORNX.P.PICS,
PORNX.P.QUEST, PORNX.P.BUZZ,
PORNX.P.CFD, PORNX.P.NETWORK,
PORNX.P.PRO, PORNX.P.LIFE,
PORNX.P.SBS, PORNX.P.STREAM,
PORNX.P.ME, PORNX.P.CLUB,
PORNX.P.ONE, PORNX.P.SPACE,
PORNX.P.TV, PORNX.P.CAM,
PORNX.P.LIVE, PORNX.P.TUBE,
PORNX.P.TOP, PORNX.P.WATCH,
PORNX.P.DOWNLOAD, PORNX.P.LOL,
PORNX.P.LAT, PORNX.P.WEBSITE,
PORNX.P.SITE, PORNX.P.ONLINE,
PORNX.P.VIDEO, PORNX.P.XYZ, AND
PORNX.P.INFO.

Defendants.

Case No.: 3:25-cv-05473-BHS

**DECLARATION OF JASON TUCKER
IN SUPPORT OF PLAINTIFF'S *EX*
PARTE MOTION FOR EARLY
DISCOVERY AND FOR AN
EXTENSION OF THE SERVICE
DEADLINE**

NOTE ON MOTION CALENDAR:
JUNE 18, 2025

DECLARATION OF JASON TUCKER ISO
PLAINTIFF'S *EX PARTE* MOTION FOR EARLY
DISCOVERY
Case No. 3:25-cv-05473

- 1

ETHAN JACOBS LAW CORPORATION
100 Pine St. Suite 1250
San Francisco, CA 94111
(415) 275-0845

1 I, Jason Tucker, under penalty of perjury, declare and state as follows:

2 1. I am a United States Citizen, over the age of 18 years old, make this declaration
3 based upon personal knowledge and, if called to testify, could and would testify competently to
4 the facts set forth herein.

5 2. I am a Director of Battleship Stance Inc., a leading intellectual property
6 management and anti-piracy enforcement company. Our clients include or have included award-
7 winning production companies, publishers, media, technology, and physical product
8 corporations, internet advertising networks, documentarians, filmmakers, photographers,
9 influencers, news outlets, and award-winning entertainment studios.

10 3. I have been in the business of legal adult entertainment productions (both on and
11 off the Internet), marketing, and management at an executive level for over twenty (20) years,
12 serving for over six (6) years as President of a company that owned and licensed one of the
13 world's largest libraries of erotic images.

14 4. As an experienced executive within the adult entertainment industry, I have been
15 featured and quoted in publications including Financial Times, Newsweek, BusinessWeek,
16 Torrent Freak, USA Today, Wired, and the Washington Post. I am frequently requested to speak
17 on panels and at seminars at industry events on various industry-related topics and trends.

18 5. I have been involved in more than fifty federal lawsuits brought against a range of
19 defendants for copyright infringement and have served as an expert witness in similar
20 proceedings.

21 6. Aylo Premium Ltd. ("Plaintiff") retained Battleship Stance, Inc. to investigate
22 copyright violations and assist in certain litigation to enforce its intellectual property rights,
23 including violations on the domain names pornxp.com, pornxp.net, pornxp.cc, pornxp.org,
24
25
26

1 pornxp.cloud, pornxp.eu, pornxp.click, pornxp.pics, pornxp.quest, pornxp.buzz, pornxp.cfd,
 2 pornxp.network, pornxp.pro, pornxp.life, pornxp.sbs, pornxp.stream, pornxp.me, pornxp.club,
 3 pornxp.one, pornxp.space, pornxp.tv, pornxp.cam, pornxp.live, pornxp.tube, pornxp.top,
 4 pornxp.watch, pornxp.download, pornxp.lol, pornxp.lat, pornxp.website, pornxp.site,
 5 pornxp.online, pornxp.video, pornxp.xyz, and pornxp.info (together, “PornXP”).
 6

7 7. I have inspected, investigated, and researched the PornXP domains and
 8 websites.

9 8. PornXP domain names use registrar-provided privacy services to hide the
 10 actual identities of the owners and operators.

11 9. PornXP websites use, among others, Oregon-based Porkbun LLC, Arizona-based
 12 NameSilo LLC, Arizona-based Spaceship LLC and Spaceship Inc. dba Spaceship, and GoDaddy
 13 Operating Company, LLC as domain registrars.
 14

15 10. Porkbun LLC provides the registrar services for the pornxp.club,
 16 pornxp.one, pornxp.tube, pornxp.download, pornxp.lat, pornxp.website, pornxp.video,
 17 pornxp.xyz, pornxp.click, pornxp.pics, pornxp.quest, and pornxp.space domains, and thus
 18 has the registration information for those domain names.

19 11. NameSilo LLC provides the registrar services for the pornxp.net, pornxp.cc,
 20 pornxp.top, pornxp.watch, and pornxp.lol domains, and thus has the registration
 21 information for those domain names.
 22

23 12. Spaceship LLC and Spaceship Inc. dba Spaceship provides the registrar
 24 services for the pornxp.buzz, pornxp.cfd, pornxp.network, pornxp.pro, pornxp.life,
 25 pornxp.sbs, pornxp.stream, pornxp.cam, pornxp.live, and pornxp.site domains, and thus
 26 has the registration information for those domain names.

1 13. GoDaddy Operating Company, LLC provides the registrar services for .tv
2 domain names, including the pornxp.tv domain name, and thus has the registration
3 information for that domain name.

4 14. Virginia-based Public Interest Registry provides the registry services for all
5 .org domain names, including the pornxp.org domain name, and thus has the registration
6 information for that domain name.

7 15. PornXP websites use, among others, Massachusetts-based Privacy Protect
8 LLC, Arizona-based PrivacyGuardian.org LLC, and North Carolina based Private by
9 Design LLC as privacy services to conceal the identity of the registrants.

10 16. Privacy Protect LLC provides the privacy services for the pornxp.cloud and
11 pornxp.org domains, and thus has the registration information for those domain names.

12 17. PrivacyGuardian.org LLC provides the privacy services for the pornxp.net,
13 pornxp.cc, pornxp.top, pornxp.watch, and pornxp.lol domain names, and thus has the
14 registration information for those domain names.


15 18. Private by Design LLC provides the privacy services for the pornxp.one,
16 pornxp.video, and pornxp.club domain names, and thus has the registration information
17 for those domain names.

18 19. I sent DMCA takedown notices on behalf of the Plaintiff to the email address
19 listed on PornXP websites. The notices were successfully delivered, and I did not receive any
20 bounce-back notifications indicating that the email addresses were invalid.

21 20. After a thorough investigation, neither the Plaintiff nor I have discovered any
22 additional information that could identify the Defendants, other than what may be held by the
23 domain privacy service, registrar, or other service providers.

1 I declare under the penalty of perjury under the laws of the United States of America that
2 the foregoing is true and correct.

3 Executed on the 10th day of June 2025 at Las Vegas, Nevada.
4

5
6 
7 Jason Tucker
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DECLARATION OF JASON TUCKER ISO
PLAINTIFF'S *EX PARTE* MOTION FOR EARLY
DISCOVERY
Case No. 3:25-cv-05473

- 5

ETHAN JACOB'S LAW CORPORATION
100 Pine St. Suite 1250
San Francisco, CA 94111
(415) 275-0845